

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

DAMILARE SONOIKI,

Plaintiff,

v.

HARVARD UNIVERSITY, et al.,

Defendants.

Civil Action No. 1:19-cv-12172-LTS

JOINT MOTION TO EXTEND THE SCHEDULING ORDER

Pursuant to Federal Rule of Civil Procedure 6(b)(1), Defendants and Plaintiff jointly move this Court for a 45-day extension of time to complete fact discovery.

In support thereof, the parties state the following:

1. On August 31, 2022, the parties served initial disclosures.
2. On September 13, 2022, Plaintiff served his initial discovery requests, including 42 requests for production, 18 interrogatories, and 21 requests for admission. Defendants' responses and objections are due October 13, 2022.
3. On September 14, 2022, Defendants served their initial discovery requests, including 23 requests for production, and 13 interrogatories. Plaintiff's responses and objections are due October 14, 2022.
4. Fact discovery is currently scheduled to close on November 30, 2022. The parties are cooperating with one another to schedule depositions and accommodate witness schedules, but anticipate they will need additional time to do so, and to meet and confer to address outstanding discovery issues after Plaintiff and Defendants serve discovery responses and objections.
5. Defendants also expect they will be undertaking an ESI review of document

custodians in response to Plaintiff's discovery requests in order to identify and produce documents relevant to those requests. That process will require additional time.

6. This is the parties' first request to extend discovery, and no additional dates beyond the close of fact discovery are currently scheduled.

7. The parties have conferred about this request, and agree that neither party will be prejudiced by the extension requested herein.

For all of these reasons, the parties respectfully request that the Court issue an Order amending the previously-ordered deadlines as follows:

Event	Current Deadline	New Proposed Deadline
Deadline for Discovery Requests	October 14, 2022	November 28, 2022
Close of Fact Discovery	November 30, 2022	January 16, 2023
Status Conference to set a schedule for experts (if necessary), summary judgment motions, and discuss mediation	December 2, 2022	January 18, 2023

Dated: October 11, 2022

Respectfully submitted,

/s/ Susan C. Stone

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on October 11, 2022.

/s/ Victoria Steinberg

Victoria Steinberg